

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

VICTORIA L. FRAZIER,

Plaintiff

v.

CIVIL NO. 3:11cv497-JRS

**EXPERIAN INFORMATION
SOLUTIONS, INC., *et al.***

Defendants.

PLAINTIFF'S MOTION TO COMPEL

COMES NOW the Plaintiff, Victoria Frazier, by counsel, and respectfully moves the court for:

(1) an order pursuant to Rule 37(c)(1) excluding any witnesses or evidence that has not been disclosed under Rule 26(a)(1) or supplemented under Rule 26(e) as of the date of the filing of this motion;

(2) an order compelling Litton without limitation to produce all the documents requested, to answer all interrogatories, and to produce the names and addresses of the employee-witnesses requested for depositions compelling them to appear for depositions on dates and times convenient to the Plaintiff, but not later than March 28, 2012.

(3) an order striking Litton's Answer and Affirmative Defenses.

Respectfully Submitted,

Victoria Frazier,

/s/

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Leonard A. Bennett, VSB #37523
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of March, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Gary L. Edwards
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_____/s/
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